

Gregson, Ashley

From: Hamilton, R. Blake
Sent: Wednesday, November 04, 2015 5:00 PM
To: Lisa A. Marcy
Cc: Gregson, Ashley
Subject: RE: Chatwin v. Draper City, et al. - Motion to Amend

Lisa,

I think it would actually be in the best interests of both of our clients if your Motion to Amend is stayed until after a ruling on the Motion for Judgment on the Pleadings. That way, if he dismisses any causes of action without prejudice, you can respond accordingly (perhaps by withdrawing the Motion and re-filing with a revised proposed amended complaint to address the Judge's concerns) instead of being stuck with the proposed amended complaint you prepared before the ruling.

Anyway, if I don't hear from you tomorrow, I will file at the close of business a motion to stay and/or for extension of time to respond to your Motion only after the Court has ruled. Please let me know as soon as possible.

Sincerely,

Blake

From: Lisa A. Marcy [mailto:LMarcy@clydesnow.com]
Sent: Friday, October 30, 2015 12:52 PM
To: Hamilton, R. Blake <BHamilton@djplaw.com>
Cc: Gregson, Ashley <AGregson@djplaw.com>
Subject: RE: Chatwin v. Draper City, et al. - Motion to Amend

Blake:

Hi, on the other hand, I am concerned that if I do that, he may be waiting to decide on the Motion to Amend first. If he grants it, then the MJOP could be rendered moot. I am pretty swamped today and traveling Monday until afternoon, but I could talk about this later afternoon.

Lisa

From: Hamilton, R. Blake [mailto:BHamilton@djplaw.com]
Sent: Wednesday, October 28, 2015 6:14 PM
To: Lisa A. Marcy <LMarcy@clydesnow.com>
Cc: Gregson, Ashley <AGregson@djplaw.com>
Subject: Chatwin v. Draper City, et al. - Motion to Amend

Lisa,

By my count Defendants' opposition to your Motion to Amend is due next Thursday. In light of the fact that the Court has heard argument and taken the Motion for Judgment on the Pleadings under advisement, it doesn't make sense to for either of us to continue briefing your Motion when the Judge may soon dismiss some of the claims. With that in mind, would you be willing to stipulate to stay the briefing on your Motion until after the Court has ruled?

Please advise at your earliest convenience and I will prepare a proposed stipulated motion.

Sincerely,

Blake

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